



November 6, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: United States Cellular Corporation ("U.S. Cellular")

Facilitating the Deployment of Text-to-911 and Other Next Generation 911  
Applications; Framework for Next Generation 911 Deployment, PS Dockets No. 11-  
153 and 10-255

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral ex parte presentation in connection with the above-captioned proceedings. On November 2, 2012, Bill Tortoriello and David Conner of U.S. Cellular along with the undersigned, met with Charles Mathias, Special Counsel to Chairman Julius Genachowski; Henning Schulzrinne, Chief Technology Officer; and Patrick Donovan and Erika Olsen of the Public Safety and Homeland Security Bureau.

During the course of that discussion, we expressed U.S. Cellular's position that the FCC should defer action on the adoption of an interim Order on Text-to-911 in favor of the issuance of an FNPRM seeking further comment on comprehensive Text-to-911 solutions. We stressed our concern that adoption of an order requiring Text-to-911 prior to resolution of the technical issues from the FNPRM could result in significant customer confusion regarding the availability of the service and potentially jeopardize public safety in certain situations.

U.S. Cellular indicated that it does not currently provide a bounceback message today, but we believe that it's technically feasible to implement. We discussed the need for the FNPRM to include a discussion regarding the need for requirements to address customers sending texts to 911 while roaming outside of

their carrier's network and for the resulting need to address interoperability across carrier networks.

U.S. Cellular also discussed that consideration needs to be given to the trigger-based mechanism for notifying carriers that a PSAP is capable of receiving texts to 911, and state and regional deployments may be more beneficial than on a PSAP-by-PSAP basis.

U.S. Cellular also indicated that it prefers that Text-to-911 be considered in the context of native SMS, and does not favor covering over-the-top text applications in the Order currently under consideration. Furthermore, U.S. Cellular discussed that, on some devices, SMS messages up-convert to MMS, and delivery of those converted messages to PSAPs would need to be further explored. These matters should be included in the FNPRM for further comment and discussion.

Sincerely,

/S/

Grant B Spellmeyer, Esq.  
Executive Director – Federal Affairs & Public Policy

CCs to:

Charles Mathias  
Henning Schulzrinne  
Patrick Donovan  
Erika Olsen